

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Singular Computing LLC,

Plaintiff,

v.

Google LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF ASIM M. BHANSALI IN SUPPORT OF
DEFENDANT GOOGLE LLC'S MOTION FOR LEAVE TO SUPPLEMENT ITS
NON-INFRINGEMENT AND INVALIDITY CONTENTIONS**

I, Asim M. Bhansali, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am an attorney at the law firm of Kwun Bhansali Lazarus LLP. I represent Defendant Google LLC ("Google") in this case.

2. I make this declaration based on my personal knowledge and on a reasonable investigation of the facts relevant to this case. If called upon to testify regarding the facts in this Declaration, I am willing and able to do so.

3. Attached hereto as **Exhibit 1** is redline version of Google's proposed Second Amended Responsive Contentions Regarding Non-Infringement and Invalidity, reflecting proposed revisions to Google's Amended Responsive Contentions Regarding Non-Infringement and Invalidity, served March 1, 2021.

4. Attached hereto as **Exhibit 2** is a redline version of Google's proposed supplemental Amended Non-Infringement Contentions, reflecting proposed revisions to Google's Amended Non-Infringement Contentions, served March 1, 2021.

5. Attached hereto as **Exhibit 3** is a redline version of Google's proposed supplemental invalidity claim chart for Belanovic and Leeser, reflecting proposed revisions to Google's invalidity claim chart served November 6, 2020.

6. Attached hereto as **Exhibit 4** is a redline version of Google's proposed supplemental invalidity claim chart for CNAPS, reflecting proposed revisions to Google's invalidity claim chart served November 6, 2020.

7. Attached hereto as **Exhibit 5** is a redline version of Google's proposed supplemental invalidity claim chart for Cray T3D, reflecting proposed revisions to Google's invalidity claim chart served November 6, 2020.

8. Attached hereto as **Exhibit 6** is a redline version of Google's proposed supplemental invalidity claim chart for GRAPE-3, reflecting proposed revisions to Google's invalidity claim chart served November 6, 2020.

9. Attached hereto as **Exhibit 7** is a "clean" version of Google's proposed Second Amended Responsive Contentions Regarding Non-Infringement and Invalidity.

10. Attached hereto as **Exhibit 8** is a "clean" version of Google's proposed supplemental Amended Non-Infringement Contentions.

11. Attached hereto as **Exhibit 9** is a "clean" version of Google's proposed supplemental invalidity claim chart for Belanovic and Leeser.

12. Attached hereto as **Exhibit 10** is a "clean" version of Google's proposed supplemental invalidity claim chart for CNAPS.

13. Attached hereto as **Exhibit 11** is a "clean" version of Google's proposed supplemental invalidity claim chart for Cray T3D.

14. Attached hereto as **Exhibit 12** is a “clean” version of Google’s proposed supplemental invalidity claim chart for GRAPE-3.

15. Attached hereto as **Exhibit 13** is a true and correct copy of Singular’s Patent Owner’s Notice of Appeal (’273 Patent), IPR2021-00179, in the *inter partes* review proceedings, filed July 12, 2022.

16. Attached hereto as **Exhibit 14** is a true and correct copy of Singular’s Patent Owner’s Notice of Appeal (’156 Patent), IPR2021-00165, in the *inter partes* review proceedings, filed July 12, 2022.

17. Attached hereto as **Exhibit 15** is a true and correct copy of Singular’s Patent Owner’s Notice of Appeal (’961 Patent), IPR2021-00155, in the *inter partes* review proceedings, filed July 12, 2022.

18. Attached hereto as **Exhibit 16** is a true and correct copy of Singular’s (Patent Owner’s Response (’273 Patent), IPR2021-00179, in the *inter partes* review proceedings, filed September 16, 2021.

19. Attached hereto as **Exhibit 17** is a true and correct copy of Singular’s (Patent Owner’s Response (’961 Patent), IPR2021-00155, in the *inter partes* review proceedings, filed September 16, 2021.

20. Attached hereto as **Exhibit 18** is a true and correct copy of Singular’s Patent Owner’s Response (’156 Patent), IPR2021-00165, in the *inter partes* review proceedings, filed September 16, 2021.

21. Attached hereto as **Exhibit 19** is a true and correct copy of the Patent Trial and Appeal Board’s (“PTAB’s”) Final Written Decision (’273 Patent), IPR2021-00179, in the *inter partes* review proceedings, issued May 11, 2022.

22. Attached hereto as **Exhibit 20** is a true and correct copy of the PTAB's Final Written Decision ('961 Patent), IPR2021-00155, in the *inter partes* review proceedings, issued May 11, 2022.

23. Attached hereto as **Exhibit 21** is a true and correct copy of the PTAB's Final Written Decision ('156 Patent), IPR2021-00165, in the *inter partes* review proceedings, issued May 11, 2022.

24. Attached hereto as **Exhibit 22** is a true and correct copy of portions of the transcript of the deposition of Andy Phelps, taken July 14, 2021.

25. Attached hereto as **Exhibit 23** is a true and correct copy of portions of the transcript of the deposition of Norman Jouppi, taken July 16, 2021.

26. Attached hereto as **Exhibit 24** is a true and correct copy of portions of the transcript of the deposition of Dr. Sunil Khatri, taken October 21, 2021.

Executed at San Francisco, CA on August 24, 2022.

/s/ Asim M. Bhansali
Asim M. Bhansali

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed